# BUDIN LAW OFFICES ONE NORTH LASALLE STREET SUITE 2165

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CHICAGO, ILLINOIS 60602

(312) 377-0700

February 28, 2018

US EPA Region 5 Ralph Metcalfe Federal Building 77 W. Jackson Blvd. Chicago, IL 60604

Margaret Rice v. Marathon Petroleum Company, et. al.

Date of Injury

October 20, 2017

File No:

17-180

Dear Sir or Madam:

Enclosed please find a Subpoena which requires you to produce documents to our offices no later than March 28, 2018. See attached rider for the various documents that are required of you and/or your company to produce. We are enclosing our check in the amount of \$25.00, which represents the statutory fee for this administrative service, and is in compliance with the following statutes (225 ILCS 60) and 735 ILCS 5/8 2007.

Your appearance will not be required at a hearing if you forward the requested records and itemized billing statements to our offices prior to the hearing date and time. If you choose this option you are not entitled to any additional fees for copying, postage and/or handling, in accordance with the above cited statutes. Your response is required even if production of medical records and billing statements occur after the stated production date.

Thank you for your anticipated cooperation.

Very truly yours,

BUDIN LAW OFFICES

JJB/rmf

Enclosure

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

No.: 18 L 000783
IMPORTANT:
THIS SUBPOENA WILL NOT NECESSITATE YOUR
PERSONAL APPEARANCE IF YOU SUBMIT ALL THE REQUESTED DOCUMENTS BY THE DUE
DATE INDICATED ON THE SUBPOENA FOR RECORDS

#### SUBPOENA FOR RECORDS DEPOSITION

TO: US EPA Region 5
Ralph Metcalfe Federal Building
77 W. Jackson Blvd.
Chicago, IL 60604

YOU ARE COMMANDED to appear to give your deposition before a Notary Public at: 1 N. LaSalle Street, Room 2165, CHICAGO, Illinois on March 28, 2018, at 10:00 a.m.

YOU ARE COMMANDED ALSO to bring the following:

#### SEE ATTACHED RIDER:

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.

Dorothy Brown
Clerk of Court

BUDIN LAW OFFICES - 37188 Attorneys for Plaintiff(s) 1 N. LaSalle St. # 2165 Chicago, IL 60602 (312) 377-0700

I served this Subpoena by mailing a copy to the above named parties, on February 28,

2018.

Rosa m Jenena

Signed and sworn to before me on this 28th day of February, 2018.

ESTHER HOOK
OFFICIAL SEAL
Notary Public, State of Illinois
My Commission Expires
My Commission Expires
Loty 14, 2019

Notary Public

BOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Re: Margaret Rice v. Marathon Petroleum Company, et. al.

D/I: File No.: 10/20/17 17-180

DOB:

03/09/1937

### RIDER

- (1) A complete copy of the entire <u>UNREDACTED</u> investigation file of the fire explosion(s) at the Knolls Condominium and any other locations including but not limited to the following:
- (2) Any and all emails and/or written communications to and from any parties including but not limited to: Speedway, Marathon Petroleum, Emro Marketing, Manoj Valiathara and/or any other employees, agents and/or servants regarding any and all gasoline leakages/explosions including but not limited to before, after and during the occurrence on or before October 20, 2017.
- (3) Any and all statements recorded, transcribed and/or hand-written notes taken from any and all witnesses, investigators, and/or any party or person involved or between any governmental agencies.
- (4) Any and all investigation reports, notes, and/or photographs of the scenes of the multiple explosions, manholes, victims and/or items involved in the various explosions including the explosion at the Knolls Condominium, 6167 Knollwood Road, Willowbrook, Illinois.
- (5) Any and all emails; text messages, and/or any other written communications or any other communications between Speedway, Marathon Petroleum Corporation and their employees, agents, subsidiaries or any other entity that are in your possession.

- (6) Any and all emails and or written communications concerning in any way the leaking of gasoline or other contaminates from underground storage tanks located at Speedway Store, 6241 S. Cass Avenue, Westmont, Illinois for any and all dates.
- (7) Any and all warnings from defendant Safeway and/or Marathon Petroleum Company before October 20, 2017, on October 20, 2017 and after October 20, 2017.
- (8) Any and all letters, emails and/or written communications from Speedway and/or Marathon Petroleum.
- (9) Any and all maps, charts, and/or graphs depicting the leak from defendant Speedway Store, 6241 S. Cass Avenue, Westmont, Illinois, for any and all dates.
- (10) Any and all inspections (UST) reports of the underground storage tanks located at Speedway, 6241 S. Cass Avenue, Westmont, Illinois.
- (11) All information regarding the location of other explosions/fires; property damage; manhole cover locations; from fire.
- (12) Any photo's, charts, diagrams, drawings, showing the manhole covers that were displaced, moved, or destroyed as a result of the explosion(s).
- (13) Any and all media communications to or from you and any and all media outlets.